

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CARLA V. CHAMBERS)
Plaintiff,)
v.)
CHOICE HOTELS INT'L, INC., et al.)
Defendants.)
Civil No. 8:11-cv-00404-DKC

**DEFENDANTS' CONSENT MOTION TO EXTEND
DISCOVERY AND RELATED DEADLINES**

Defendants Choice Hotels International, Inc. and Choice Hotels International Services Corporation (“Defendants”), by and through counsel, hereby move pursuant to Local Rule 105 with the consent of Plaintiff’s counsel to extend the deadlines for discovery closing, service of requests for admissions and filing of dispositive pretrial motions by approximately sixty (60) days. In support of this Motion, Defendant is submitting the attached Memorandum.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and

enter the attached Proposed Order.

Respectfully submitted,

/s/

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Date: September 12, 2011

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CARLA V. CHAMBERS)
Plaintiff,)
v.)
CHOICE HOTELS INT'L, INC., et al.)
Defendants.)
Civil No. 8:11-cv-00404-DKC

**MEMORANDUM IN SUPPORT OF DEFENDANTS' CONSENT
MOTION TO EXTEND DISCOVERY AND RELATED DEADLINES**

Defendants Choice Hotels International, Inc. and Choice Hotels International Services Corporation (“Defendants”), by and through counsel and pursuant to Local Rule 105, hereby submit this Memorandum in support of their Consent Motion to Extend Discovery and Related Deadlines in the above-captioned case.

Plaintiff filed the Complaint in this case on February 16, 2011, and served Defendant with the Summons and Complaint on February 23, 2011. Discovery is currently set to close on September 30, 2011. The Court granted Plaintiff's Motion to Amend the Complaint on June 15, 2011. Plaintiff served the Amended Complaint on Defendants by letter dated June 27, 2011. The parties have exchanged written discovery requests and responses, and have produced documents to one another. However, no depositions have been taken yet. Recently, Plaintiff has filed a Second Request for Production of Documents, and has asked Defendants to further supplement their responses to Plaintiff's First Request for Production of Documents. This will require Defendants to review over 3,500 additional documents to determine if they must be produced. Due to the fact that discovery is scheduled to close in less than three (3) weeks, and

depositions of key witnesses have yet to be taken, the parties will not be able to complete discovery by September 30, 2011. Accordingly, Defendants request, with the consent of the Plaintiff, that the remaining deadlines in the Scheduling Order be extended as follows:

November 29, 2011: Discovery deadline; submission of status report

December 6, 2011: Requests for admission

January 13, 2012: Dispositive pretrial motions deadline

Plaintiff's counsel consents to this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion and enter the attached Proposed Order.

Respectfully submitted,

/s/

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Date: September 12, 2011

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2011, a true and correct copy of the foregoing Consent Motion, Memorandum and Proposed Order was served by the Court's electronic filing system upon the Counsel of Record.

/s/

Michael L. Stevens